

# Exhibit 11

**EXHIBIT 11**

**DECLARATION OF MAGDALENA SAM CASTRO  
IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

Magdalena Sam Castro, upon oath and affirmation, hereby deposes and says:

1. I make this declaration upon my personal knowledge of the facts, and I am competent to testify to the facts stated herein.
2. I am a 24-year-old mother of two children and a resident of Guatemala.
3. In the spring of 2004 I found out I was pregnant. I was 20 years old and I had lost my job packing fish. I didn't speak any English. People told me that it cost \$8000 to have a baby. The baby's father was worried and said that we didn't have \$8000. I didn't want to have an abortion, but I thought I had to.
4. I took a taxi to the WomanCare abortion clinic at 12 Brigham Street in New Bedford, MA. We saw Mary Anne McGuire getting out of her car. She walked to me and the taxi driver translated what she said. Mary Anne said that what they did in the clinic was not good. She had a booklet in Spanish that explained what an abortion really is. I didn't know that's what they did in the clinic. That's when I realized it was killing. She said she would help my baby to be adopted, but I told her I wanted to keep my baby.
5. Mary Anne said not to be afraid because she would help me. She paid the taxi driver, then she drove me to A Woman's Concern where a woman did an ultrasound. Before that day I didn't know that a machine could show you what your baby looks like inside you, and I didn't know my baby was formed and moving. The woman told me my baby was nine weeks old. When I saw the baby's feet and heard his heart, I felt so happy and wanted to keep him.

6. I told them what people had told me about the cost of having a baby. Mary Anne said she would help me. She took me to a doctor every month, and then every week, and I didn't have to pay. Her friends gave me maternity clothes and baby clothes. She came to the hospital and stayed with me when my son was born on November 1, 2004. I asked her to be his godmother, and she said yes.

7. I am glad that Mary Anne was able to tell me that the baby inside me was alive and moving. Later, when I could feel the baby moving inside me, I was very happy that he was alive. Because of Mary Anne I did not make the mistake of having the abortion. When I saw my baby son, I was even happier.

8. If Mary Anne did not tell me these things, I would have felt guilty for having killed my baby. I would have felt sad for the rest of my life if she had not been there.

9. The way Mary Anne talked to me was good because she gave me all the information about the abortion. It was very difficult for a person like me who didn't know anything about abortion. It would be very, very sad if a person like me could not get this information.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 14<sup>th</sup> day of January, 2008.

Magdalena Sam Castro  
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